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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON**

YUKI LEE, in her capacity as
personal representative of the
Estate of her deceased husband,
JOOCHAN LEE, individually and
Decedent's surviving wife, and in
her capacity as Guardian of their
minor daughter, A.L. both as
beneficiaries and heirs of
Decedent's estate,

Plaintiffs,

vs.

THE MOODY BIBLE INSTITUTE OF
CHICAGO, and Illinois corporation,

Defendant.

No. 2:19-cv-00326-SAB

**STIPULATED MOTION AND
ORDER TO EXTEND CASE
DEADLINES AND CONTINUE
TRIAL**

COME NOW the parties to jointly stipulate and request that the Court
adjust the subsequent deadlines and trial date as follows:

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STIPULATED MOTION AND ORDER TO
EXTEND CASE DEADLINES AND
CONTINUE TRIAL- 1

Deadline	Current Deadline	New Deadline
Plaintiff Expert Disclosures.	11/4/20	3/4/21
Defendant Expert Disclosures	2/2/21	6/2/21
Rebuttal Expert Disclosures	3/4/21	7/4/21
Discovery Deadline	6/7/21	10/7/21
Motions to Amend Pleadings or Add Parties	3/29/21	7/29/21
Daubert Motion Deadline	4/16/21	8/16/21
Dispositive Motions	6/15/21	10/15/21
Motions in Limine	9/13/21	1/13/22
Motions in Limine - Responses	9/20/21	1/20/22
Motions in Limine - Replies	9/27/21	1/27/22
Exhibit and Witness Lists	9/20/21	1/20/22
Exhibit and Witness Lists - Objections	9/27/21	1/27/22
Exhibit and Witness Lists – Responses	10/4/21	2/4/22
Pretrial Exhibit Stipulation	10/4/21	2/4/22
Designation of Testimony.	9/13/21	1/13/22
Pretrial Order	10/4/21	2/4/22
Trial Briefs and Proposed Voir Dire	9/30/21	1/30/22
Jury Instructions	9/30/21	1/30/22
Jury Trial	10/24/21	2/22/22

The parties submit there is good cause for an extension of the deadlines.

First, on February 29, 2020 Governor Jay Inslee declared a state of emergency in Washington in response to the cases of COVID-19 in the state. On March 11, 2020, the World Health Organization publicly characterized COVID-19 as a pandemic. The President declared a National Emergency in an effort to address the spread of COVID-19 on March 13, 2020. On March 16, 2020, the President announced new guidance to slow the spread of the virus, including avoiding groups of more than 10 people

1 and working or schooling from home whenever possible. This guidance
2 follows recommendations by the Centers for Disease Control to engage in
3 social distancing, and, in some circumstances, to close schools.

4 This has affected the ability of the undersigned counsel to conduct
5 in-person meetings, depositions, and other work, which has created a
6 backlog. Further, as the current pandemic and social distancing guidelines
7 are expected to be in place for some time, it will affect the ability to
8 conduct depositions in this case and the scheduling and availability for
depositions due to the workload on other cases.

9 In addition, the wreckage of the plane from the crash that is the
10 subject of this lawsuit was only released for inspection by the NTSB in the
11 Fall of 2020. This has greatly affected the ability of the parties to provide
12 timely expert disclosures and conduct in-depth technical discovery.

13 The brief extension of the case deadlines and trial will allow
14 additional time to address these issues.

15 DATED this 15th day of October 2020.

16 ***HERRMANN LAW GROUP***

16 **ADLER MURPHY & McQUILLEN LLP**

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ORDER

IT IS SO ORDERED.

Dated this ____ day of October, 2020.

Hon. Stanley A. Bastian
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of October 2020, I electronically filed the foregoing document, with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the following:

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